



SPECIALIST IN LAND CONDITION

# Regeneration of Historical Landfill Sites – A Designers Perspective

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# Your Presenter



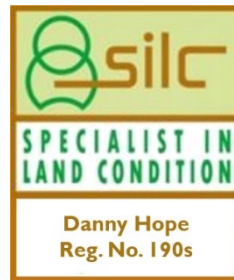
## DANNY HOPE

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- SiLC, SQP and QP with over 20 years land brownfield remediation experience

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# Overview

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Due to the demand on land resources in England and Wales, redevelopment of historic landfills is becoming more common.

While this can create challenges from an environmental and regulatory perspective, it creates a fantastic opportunity to bring these sites back into beneficial use.

One of those challenges is the inconsistency in how these sites are regulated via the implementation of current waste legislation and guidance.

The fundamental principle should be that the remediation / earthworks to create the required development will achieve the geo-environmental objectives and create a site that is Suitable for Use.

# Types of Sites

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Historical landfill sites in England and Wales may be:

- Permitted / licensed (active environmental permit or waste management license)
- Surrendered (environmental permit or waste management license)
- Pre-licensing (i.e., filled before Control of Pollution Act 1974) infilled prior to waste management controls



# Current Approaches

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Whilst most land contamination projects are regulated under the Town and Country Planning Act 1990 (as amended) via redevelopment, other key guidance and legislation comes into play:

## Definition of Waste: Development Industry Code of Practice

- Introduced in 2008, revised in 2011
- England and Wales government response to the EU Waste Directive
- Allows a 'self-regulatory' approach

## Environmental Permitting (England and Wales) Regulations 2016

- Standard Rules
- Bespoke
- Mobile Plant
- Waste Recovery

# Waste Recovery Plan

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Ultimately the waste recovery plan should lead to acceptance by the EA that the post-remediation deposition of the treated waste is a waste recovery activity (as opposed to it being a waste deposition activity), thereby allowing the contractor to proceed with an application for a Deposit for Recovery permit.

Key to this is the formulation of a conceptual site model and detailed quantitative risk assessment in order to allow completion and re-use criteria to be agreed and subsequently verified.

# Typical WRP Reporting Framework

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- Develop Regulatory Framework for Materials Management - consult with the EA
- Develop Hydrogeological Site model
- Detailed Risk Assessment
- Develop Remediation Strategy
- Produce DRAFT Waste Recovery Plan - consult with the EA
- Issue FINAL Waste Recovery Plan
- Consult with the regulators to achieve sign-off for the remediation strategy
- Prepare Environmental Site Setting and Site Design Report
- Prepare Deposit for Recovery Permit application

Typical timescale 12-18 months.....MMP a matter of weeks.....

# Case Study – Coventry Gateway

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COVENTRY GATEWAY

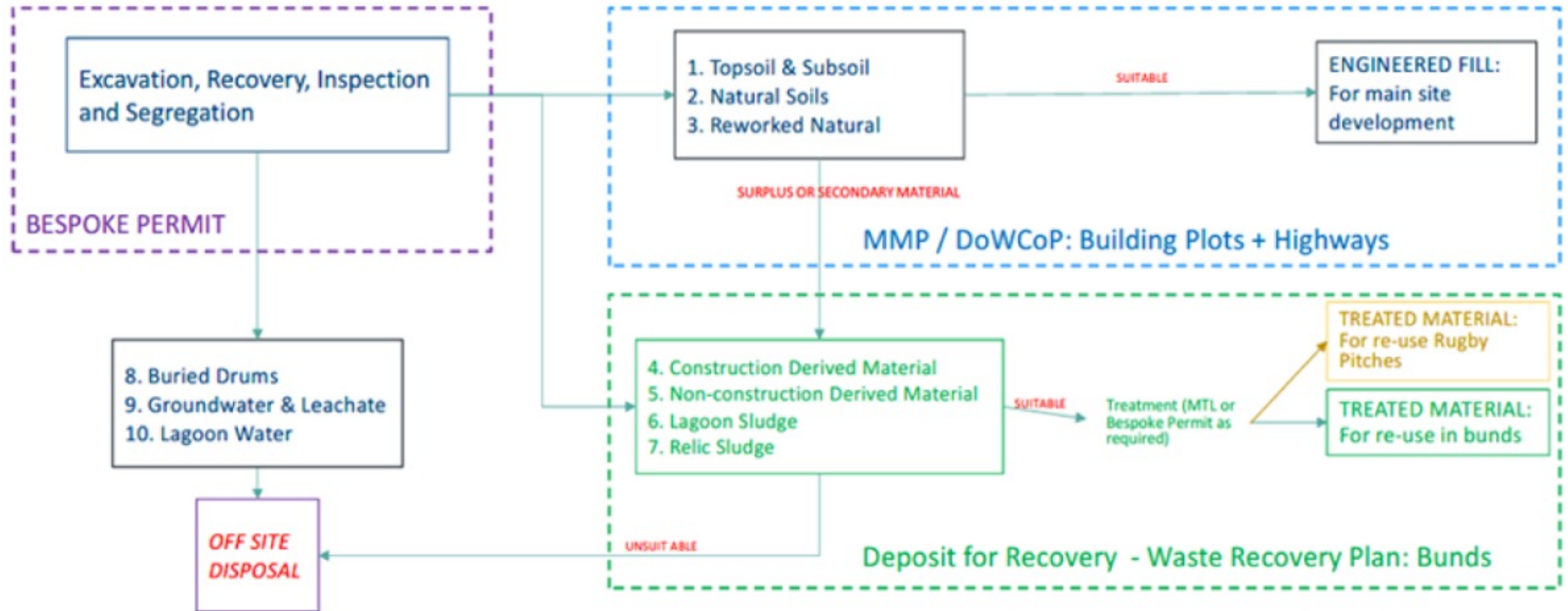




COVENTRY GATEWAY



# Example Process Flow Chart







COVENTRY GATEWAY





COVENTRY GATEWAY





COVENTRY GATEWAY



# Case Study – St Helens Linkway

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# ST HELENS LINKWAY





# ST HELENS LINKWAY





# ST HELENS LINKWAY





# ST HELENS LINKWAY





# ST HELENS LINKWAY





# So What's The Issue?

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From these two very different case studies, its quite clear cut:

- One has an active environmental permit and warrants additional assessment and scrutiny (but...)
- One is pre-licensing remediated via mobile plant permit and MMP

What about those that fall in between, e.g., those with surrendered permits, many of which contain mixed Made Ground which is found on almost every brownfield site?

Land formerly used for disposal of waste may be passed over by developers due to excessive programme and cost in preference for less challenging greenfield sites, not a sustainable approach.

# What are the EA doing?

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We believe the EA are developing internal guidance to aid officers decision making in this area and this is currently under legal review, watch this space.....

# Recommendation

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In our letter to government, we suggested:

EITHER: Amend the guidance within the Definition of Waste: Development Industry Code of Practice (Contaminated Land: Applications in Real Environments (CL:AIRE), V2, 2011) to include the re-use of site won materials from within historic landfills.

OR: Produce new guidance which streamlines the waste recovery and surrender process for the re-use of materials from within historic landfills.

We hope this is taken on board in the aforementioned EA internal guidance.

# SiLC Survey - DoWCoP

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SiLC has produced a survey to canvass opinion on the issues discussed here.

Please complete the survey which will only take 5 minutes and can be found here:

<https://www.surveymonkey.co.uk/r/CM2QZ26>

# Useful Links

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<http://ec.europa.eu/environment/waste/framework/guidance.htm>

<https://www.claire.co.uk/projects-and-initiatives/dow-cop>

<https://www.gov.uk/guidance/waste-recovery-plans-and-permits>

<https://www.silc.org.uk/content/uploads/2021/06/Sustainable-and-Safe-Re-Use-of-Materials-on-Brownfield-Development-Sites-Letter.pdf>

[AGS – Association of Geotechnical and Geoenvironmental Specialists – Should we get excited about the Mining Waste Directive and DoWCoP?](#)